

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04100010-2016**
Application Received: **October 28, 2015**
Plant Identification Number: **041-00010**
Permittee: **Dominion Transmission, Inc.**
Facility Name: **Camden Compressor Station**
Mailing Address: **925 White Oaks Blvd.,
Bridgeport, WV 26330**

Physical Location:	Route 2, Camden, Lewis County, West Virginia
UTM Coordinates:	534.85 km Easting • 4323.27 km Northing • Zone 17
Directions:	Interstate 79 North to the Weston Exit. Turn left on Route 33 West through Weston. Turn left onto Smith Run Road and go 1.5 miles. Turn left onto gravel road and proceed 0.3 miles to station on the left.

Facility Description

Camden Compressor Station (CS) is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922 and North American Industry Classification System (NAICS) Code 486210. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of five (5) 660 HP natural gas fired reciprocating engines, one (1) emergency generator, one (1) dehydrator reboiler, one (1) dehydration unit, and seven (7) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2014 Actual Emissions
Carbon Monoxide (CO)	98.09	79.19
Nitrogen Oxides (NO _x)	647.08	501.90
Particulate Matter (PM _{2.5})	4.56	1.59
Particulate Matter (PM ₁₀)	4.56	1.59
Total Particulate Matter (TSP)	5.77	1.59
Sulfur Dioxide (SO ₂)	0.07	0.06
Volatile Organic Compounds (VOC)	197.47	171.15
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2014 Actual Emissions
Total*	12.46	7.65

Some of the above HAPs may be counted as PM or VOCs.

**No single HAP is more than 10 TPY. Largest single HAP emission is Formaldehyde with potential emissions of 3.94 TPY.*

Title V Program Applicability Basis

This facility has the potential to emit 647.08 TPY of NO_x and 197.47 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc. Camden Compressor Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Control of PM from Combustion of Fuel in Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction Permits
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60 (NSPS)
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.

	45CSR30	Operating permit requirement.
	45CSR34	National Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40 C.F.R. 63 (NESHAP)
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. 63 Subpart HH	NESHAP: Oil & Natural Gas Production Facilities.
	40 C.F.R. 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
State Only:	45CSR4	No objectionable odors.
	45CSR17	Fugitive Particulate

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2792	March 4, 2009	
G60-C014	December 4, 2009	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following are changes/additions to the most recent Title V permit for this facility:

- 1) Equipment Table 1.1 – Air Compressor CPR01 was removed from the facility and from the table. 3-way (built-in) catalyst (NSCR) 1C for the Emergency generator EG01 was added. List of Tanks was included with the Equipment Table per the company's request.
- 2) Requirement 3.7.2 (Permit shield) – old section 3.7.2(b) was removed because 40 C.F.R 63 Subpart HH and Subpart ZZZZ have been adopted under 45CSR34. New section 3.7.2(b) was added for non-applicability of CAM to DEHY01's VOC emissions.
- 3) Section 5.0 – since the facility is subject to 40 C.F.R. 63 Subpart HH, all citations to 40 C.F.R. 63 Subpart HHH were removed. Condition 5.3.3 was removed because it is the same as condition 5.1.14.b. Old

condition 5.5.1 was removed because it was included in condition 5.5.3 (old condition 5.5.4). Conditions 5.5.2 through 5.5.5 were re-numbered to 5.5.1 through 5.5.4.

- 4) Section 6.0 – per the Company’s request requirements of the General Permit Registration G60-C014 and General Permit G60-C for emergency generator EG01 were included with Section 6.0 of this permit instead of the incorporation by reference (IBR) in the Appendix A. Section 8 General Permit applicable requirements (40 C.F.R. 60 Subpart JJJJ) for the 475 HP SI emergency generator (EG01), constructed and installed in 2009 (“new”), and certified by manufacturer (with the 3-way catalyst 1C), were added under conditions 6.1.3 through 6.1.7, and 6.4.2. Section 5 applicable General Permit requirements (R.I.C.E.) were added under conditions 6.1.1, 6.1.8 through 6.1.10, and condition 6.4.1. Also, old condition 6.1.2 was removed as non-valid, and old requirement 6.1.3 was re-numbered to 6.1.2. Condition 6.2.1 was added for the 3-way catalyst (NSCR) 1C based on underlying General Permit G60-C requirement 5.2.1.
- 5) Section 7.0 – requirement for Air Compressor CPR01 was removed from condition 7.1.1 (40 C.F.R 63 Subpart ZZZZ Table 2d, row 9). Old requirement 7.1.2 was removed because it is obsolete (the compliance date has passed). Old requirements 7.1.3 through 7.1.5 were re-numbered to 7.1.2 through 7.1.4. Condition 7.5.1 was removed because the engines are not subject to the notifications requirement (40 C.F.R § 63.6645). 40 C.F.R 63 Subpart ZZZZ requirements were updated according to the latest Subpart ZZZZ revision. Also, Table 6 to Subpart ZZZZ of Part 63 was added to condition 7.1.3. Requirements 7.1.1, 7.1.3, 7.2.1 and 7.4.1 were revised to clarify applicability of 40 C.F.R 63 Subpart ZZZZ to the engines EN01-EN05.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- 1) The following are small tanks that do not have any regulatory requirements:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
TK01	TK01	Vertical, above ground tank containing Triethylene Glycol	1991	2730 gallon	N/A
TK02	TK02	Vertical, above ground tank containing used oil	1991	2730 gallon	N/A
TK03	TK03	Vertical, above ground tank containing ethylene glycol	1991	4200 gallon	N/A
TK04	TK04	Vertical, above ground tank containing ethylene glycol	1962	2100 gallon	N/A
TK06	TK06	Vertical above ground tank containing wastewater	1962	2730 gallon	N/A
TK07	TK07	Horizontal, above ground tank containing lube oil	2003	7000 gallon	N/A
TK08	TK08	Horizontal, above ground tank containing produced fluids	2011	8000 gallon	N/A

- 2) **40 C.F.R. Part 63 Subpart HHH – National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities.** According to §63.1270(a), this MACT applies to major sources of HAPs. This facility is not a major source of HAPs; therefore, this MACT does not apply. Furthermore, 40CFR§63.1270(a) states, “A compressor station that transports natural gas prior to the point of custody transfer, or to a natural gas processing plant (if present) is not considered a part of the natural

gas transmission and storage source category.” This statement also excludes the facility from being subject to Subpart HHH.

- 3) **40 C.F.R. Part 64 – Compliance Assurance Monitoring.** According to the renewal application, the engines (EN01 through EN05) and emergency generator (EG01) do not have any control devices. Since these emission units do not meet the applicability criterion at 40CFR§64.2(a), CAM is not applicable to them.

Dehydration Unit Reboiler (RBR01) does have a control device (Flare F1), but it doesn’t have any emission limits in the permit, therefore it is not considered a PSEU per 40CFR§64.2(a)(1) and CAM is not applicable.

The dehydration unit (DEHY01) is a PSEU for HAPs and VOC emissions because it meets all of the applicability criteria in 40CFR§64.2(a): (1) it has emission limits for HAPs and VOC (condition 5.1.10), (2) it uses a control device (Flare) to achieve compliance with these limits, and (3) potential pre-control device emissions of HAPs and VOC are higher than the major source applicability criteria (10 TPY for a single HAP, 25 TPY of aggregated HAPs, and 100 TPY for criteria pollutants). However, the DEHY01 meets the exemption in 40CFR§64.2(b)(1)(i) for HAP emissions, since the facility is subject to 40 C.F.R. 63 Subpart HH; therefore CAM is not applicable to the DEHY01 for HAPs.

For the VOC emissions of the DEHY01, it was determined during the review of R30-04100010-2006 (SM01) in 2009 that the DEHY01 didn’t meet any exemption in 40CFR§64.2(b), and met the applicability criteria in 40CFR§64.2(a), therefore it was subject to CAM. The CAM plan was included with the permit at that time (on June 9, 2009).

However, per the company’s request, the CAM applicability for the DEHY01 for VOC emissions was re-considered during this permit renewal process. It was found that per 40CFR§64.5(b), the CAM applicability determination should have been conducted during the permit renewal process in 2011, and not during the significant modification process (SM01) in 2009 since, per 40CFR§64.5(a), the DEHY01 was not considered a large PSEU for VOC (VOC emissions after control device were limited to 20.88 TPY). Furthermore, if the CAM applicability determination had been conducted during the permit renewal in 2011, it would have been determined that CAM was not applicable to the DEHY01 for VOC because it was exempted per 40CFR§64.2(b)(1)(vi) since the Title V permit already specified “a continuous compliance determination method” (condition 5.2.5, underlying R13-2792 condition 5.2.1) included in the permit during SM01 (issued on June 9, 2009).

Therefore, based on the information above, the DEHY01 was found not to be subject to CAM for VOC, and all the requirements of the CAM plan (included in the permit on June 9, 2009 during SM01, were removed (5.2.7-5.2.12, 5.4.12, 5.4.13 and 5.5.6).

- 4) Old requirement 5.1.13 (**40 C.F.R. §63.760(f)(6)**) – deleted because it is obsolete since the dehydration unit DEHY01 was installed in 2009. Old requirements 5.1.14 and 5.1.15 were re-numbered to 5.1.13 and 5.1.14.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date:	Wednesday, June 29, 2016
Ending Date:	Friday, July 29, 2016

Point of Contact

All written comments should be addressed to the following individual and office:

Natalya V. Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478
natalya.v.chertkovsky@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.